

# **Deficiency Progress Report – Update 1**

Report Submitted: 10/01/2008

**CUPA: Yuba County Environmental Health**

**Evaluation Date: July 29 - 30, 2008**

## **Evaluation Team:**

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**Corrected Deficiencies: [1](#), [2](#)**

- 1. Deficiency:** In some instances, the CUPA does not leave a notice to comply (NTC) with a facility at the conclusion of an inspection. Instead, the CUPA sends a NTC by mail to the facility after completing the inspection.

**Preliminary Corrective Actions:** At the conclusion of an inspection, the CUPA will routinely leave a NTC at the facility if minor violations are cited.

By October 30, 2008, please submit to Cal/EPA an example of a NTC dated and signed by the owner/operator during the day of inspection.

**CUPA's 1<sup>st</sup> Update (10-1-08):** In response to the deficiency noted above: It has been the practice of the Yuba County CUPA to leave a Notice to Comply (NTC) for minor violations at the conclusion of an inspection, with regards to the Hazardous Waste Generator statutes. However, we determined during time accounting a significant loss of efficiency that hand writing the NTC at the time of the inspection was causing. It is our policy to deliver a final electronic version of the inspection report, which includes the checklist, NTC, a self-correction form, within two days of conducting the inspection. Therefore, writing out a handwritten NTC at the time of inspection was duplicating work, as well as, costing the facility time during the inspection process. We also asked our facilities whether they would prefer a preliminary immediate NTC, which was handwritten, or would rather wait an additional few days for a clean, final, electronic version of the NTC. Each facility opted for the final electronic version. To allow the facility a full 30 days to comply, we added the additional days required to complete and mail the report, thereby increasing the compliance time over 30 days from the date of the inspection (see deficiency #2). To alleviate the duplication and inefficiency of handwriting a NTC at the time of the

inspection and still meet the Hazardous Waste Generator statute we have implemented an infield printer for all our inspectors. This allows for immediate completion of the NTC created during the inspection process after conclusion of the program checklist. This also eliminated the need to adjust the days for compliance, as we can provide an electronic copy of the NTC at the end of the inspection which states the facility has 30 days to comply with all minor violations (Note: This corrects deficiency #2 also) . I have provided PDF copies of the first five hazardous waste inspection NTC documents provided to the facility at the conclusion of the inspection and the summary of corrections/self correction form provided to the facility.

**Cal/EPA's 1<sup>st</sup> Response:** Cal/EPA and DTSC consider this deficiency corrected.

2. **Deficiency:** The CUPA mails the NTC after the inspection and allows 30 days after the date it is mailed for the facility to come back into compliance.

**Preliminary Corrective Actions:** At the conclusion of an inspection, the CUPA will routinely leave a NTC at the facility if minor violations are cited.

By October 30, 2008, please submit to Cal/EPA an example of a NTC dated and signed by the owner/operator during the day of inspection providing 30 days from the date of inspection for the facility to return back to compliance.

**CUPA's 1<sup>st</sup> Update (10-1-08):** In response to the deficiency noted above: It has been the practice of the Yuba County CUPA to leave a Notice to Comply (NTC) for minor violations at the conclusion of an inspection, with regards to the Hazardous Waste Generator statutes. However, we determined during time accounting a significant loss of efficiency that hand writing the NTC at the time of the inspection was causing. It is our policy to deliver a final electronic version of the inspection report, which includes the checklist, NTC, a self-correction form, within two days of conducting the inspection. Therefore, writing out a handwritten NTC at the time of inspection was duplicating work, as well as, costing the facility time during the inspection process. We also asked our facilities whether they would prefer a preliminary immediate NTC, which was handwritten, or would rather wait an additional few days for a clean, final, electronic version of the NTC. Each facility opted for the final electronic version. To allow the facility a full 30 days to comply, we added the additional days required to complete and mail the report, thereby increasing the compliance time over 30 days from the date of the inspection (see deficiency #1). To alleviate the duplication and inefficiency of handwriting a NTC at the time of the inspection and still meet the Hazardous Waste Generator statute we have

implemented an infield printer for all our inspectors. This allows for immediate completion of the NTC created during the inspection process after conclusion of the program checklist. This also eliminated the need to adjust the days for compliance, as we can provide an electronic copy of the NTC at the end of the inspection which states the facility has 30 days to comply with all minor violations (Note: This corrects deficiency #1 above) . I have provided PDF copies of the first five hazardous waste inspection NTC documents provided to the facility at the conclusion of the inspection and the summary of corrections/self correction form provided to the facility.

**Cal/EPA's 1<sup>st</sup> Response:** Cal/EPA and DTSC consider this deficiency corrected.